

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
MONTGOMERY DIVISION**

**BETTY ANN BURKS, et al.,**

**Plaintiffs,**

**v.**

**EQUITY GROUP EUFAULA  
DIVISION, LLC,**

**Defendant.**

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**CIVIL ACTION NO.  
2:06-cv-01081-MEF-DRB**

**MOTION FOR ADMISSION  
PRO HAC VICE OF RICHARD CELLER**

Pursuant to Local Rule 83.1(b), Robert J. Camp, a member in good standing of the bar of the Court and one of the attorneys for Plaintiffs, moves the Court to admit Richard Celler *pro hac vice* as additional counsel for Plaintiffs, and in support thereof states as follows:

1. Richard Celler is a licensed attorney with the firm of Morgan & Morgan located at 284 S University Drive, Fort Lauderdale, Florida 33324. Mr. Celler's telephone number is (954) 318-0268, his fax number is (954) 333-3515, and his e-mail address is [richard@cellerlegal.com](mailto:richard@cellerlegal.com).

2. Mr. Celler is a member in good standing of the Florida and New Jersey state bars and is admitted to practice in the United States District

Courts for the Northern, Middle and Southern Districts of Florida, United States District Court for New Jersey, and the 11<sup>th</sup> Circuit Court of Appeals. Attached as Exhibit “A” is Mr. Celler’s Certificate of Good Standing for the U. S. District Court for the Southern District of Florida.

4. Mr. Celler has not been the subject of any grievance proceeding or involuntary removal proceeding while a member of the bars of any state or federal court.

5. Mr. Celler has not been charged, arrested or convicted of a criminal offense or offenses.

**WHEREFORE**, your Petitioner prays this Honorable Court will enter an Order allowing Richard Celler to appear *pro hac vice* with your Petitioner as additional counsel for the Plaintiffs in the above action.

Dated: January 31, 2007

Respectfully submitted,

**THE COCHRAN FIRM, P.C.**

/s/ Robert J. Camp

**ROBERT J. CAMP**

**BERNARD D. NOMBERG**

505 North 20<sup>th</sup> Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone)

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– and –

Samuel A. Cherry, Jr.  
Lance H. Swanner  
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Dothan, AL 36302  
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(334) 793-8280 (Fax)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2007, I electronically filed the foregoing Motion for Admission *Pro Hac Vice* of Richard Celler with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Courtney Reilly Potthoff  
[cpotthoff@mindspring.com](mailto:cpotthoff@mindspring.com)

Joel P. Smith, Jr.  
[joelpsmith@bellsouth.net](mailto:joelpsmith@bellsouth.net)

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/s/ Robert J. Camp  
**ROBERT J. CAMP**

## EXHIBIT "A"

AO 136  
(Rev. 6/82)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA



### CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA  
SOUTHERN DISTRICT OF FLORIDA



Fla. Bar. # 173370

I, **CLARENCE MADDOX**,

Clerk of the United States District Court  
for the Southern District of Florida,

DO HEREBY CERTIFY that **Richard Bernard Celler** was duly admitted to  
practice in said Court on **02/14/2000**, and is in good standing as a member of the bar of this Court.

Dated at: **Miami, Florida**, this **January 24, 2007**.

**CLARENCE MADDOX**  
Court Administrator • Clerk of Court

By

A handwritten signature in dark ink, appearing to be "CM", written over a horizontal line.

Deputy Clerk